

DECLARATION OF JULIE J. SHEMITZ

I, Julie J. Shemitz, declare as follows:

1. I am an Assistant United States Attorney for the Central District of California. I have knowledge of the facts set forth herein and could and would testify to those facts fully and truthfully if called and sworn as a witness.

2. This declaration is being submitted in support of a status report to the Court regarding the dates for trial for the various defendants.

3. On April 4, 2024, the United States filed a First Superseding Indictment in United States v. Edgar Joel Martinez-Reyes, et al., 2:23-cr-524(A)-DMG, consolidating that case with a previously-filed case, United States v. Sai Zhang, et al., 2:23-cr-258-DMG in one indictment charging all 24 defendants from the two prior cases.

4. Previously, the two cases had been set for trial on separate dates: (1) U.S. v. Zhang, et al. is currently set for March 25, 2025; and (2) U.S. v. Martinez-Reyes, et al. is currently set for November 5, 2024.

5. On July 24, 2024, the government filed an ex parte request to consolidate the docket in these two cases and to correctly reflect the contact information of all defense counsel.

6. At present, the parties are in the process of filing a further stipulation to continue and consolidate the trial dates. That stipulation will be filed as soon as possible.

7. I have not consulted defense counsel with respect to the filing of this ex parte status report as they are already aware of

1 the facts herein and previously consented to the government's ex
2 parte motion to consolidate the docket.

3 I declare under penalty of perjury under the laws of the United
4 States of America that the foregoing is true and correct and that
5 this declaration is executed at Los Angeles, California, on July 26,
6 2024.

7
8 
9 JULIE J. SHEMITZ
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28